

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED
MAY 23 2006
PUBLIC SERVICE
COMMISSION

In the Matter of:

AN INQUIRY INTO LIMITATIONS)
OF USE FOR TARIFFED SERVICES) ADMINISTRATIVE
DESIGNATED OR OTHERWISE) CASE NO. 2005-00186
REFERRED TO AS UNLIMITED)

ATTORNEY GENERAL'S MOTION TO COMPEL RESPONSES TO
SUPPLEMENTAL REQUESTS FOR INFORMATION

Comes now the Attorney General, by counsel, and hereby moves the Commission to compel responses to his previously-issued supplemental data requests.

In support of this motion, counsel states that he has received information from MCI Worldcom Network Services, Inc., and MCIMETRO Access Transmission which he believes is non-responsive to Supplemental Data Request No. 3. The Attorney General respectfully requests that the Commission issue an order compelling a complete response.

In further support of this motion, counsel states that, to the best of his knowledge, the following entities have failed to provide any responses whatsoever to the aforementioned Supplemental Data Requests:

1. Excel Telecommunications, Inc.
2440 Marsh Lane
Carrollton, TX 75006
2. VarTec Solutions, Inc.
2440 Marsh Lane
Carrollton, TX 75006
3. BELL ATLANTIC COMMUNICATIONS, INC.
(dba VERIZON LONG DISTANCE)
NYNEX LONG DISTANCE Co.
(dba VERIZON ENTERPIRSE SOLUTIONS)
John Broten
Director- Regulatory Group
Bell Atlantic Coomunications, Inc.
dba Verizon Long Distance
1320 N. Courthouse Rd.
9th Floor
Arlington, VA 22201
4. NUVOX COMMUNICATIONS, INC.
Mary Campbell
Two North Main Street
Greenville, SC 29601
5. EVERYCALL COMMUNICATIONS, INC.
Kyle Coats
10500 Coursey Blvd.
Ste. 306
Baton Rouge, LA 70816
6. MOMENTUM TELECOM, INC.
Alan Creighton
2700 Corporate Drive
Ste. 200
Birmingham, AL 35243
7. AERO COMMUNICATIONS LLC
Todd Heinrich
1301 Broadway
Ste. 100
Paducah KY 42001

8. ALLTEL COMMUNICATIONS, INC.

Daniel Logsdon
Vice President-External Affairs
P. O. Box 1650
Lexington, KY 40588-1650

ALLTEL KENTUCKY, Inc.

Daniel Logsdon
229 Lees Valley Rd.
Shepherdsville, KY 40165

9. COMM SOUTH COMPANIES, INC.

Felicia Mayo
P. O. Box 821269
Dallas, TX 75382

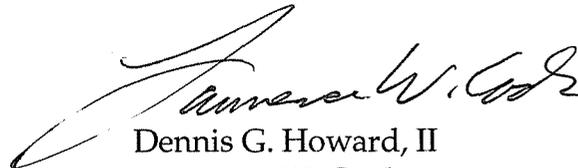
10. CINCINNATI BELL TELEPHONE COMPANY

Mark Romito Director - Government Relations
201 East Fourth Street
P. O. Box 2301
Cincinnati, OH 45201-2301

11. 1-800-RECONEX, Inc.

dba USTel
Jennifer Sikes
2500 Industrial Avenue
P. O. Box 9
Hubbard, OR 97032-0009

Respectfully submitted,
GREGORY D. STUMBO
ATTORNEY GENERAL



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Frankfort, KY 40601-8204
502-696-5453

Certificate of Service

Counsel certifies filing of the original and ten photocopies of the Attorney General's Motion to Compel Production by hand delivery to Beth O'Donnell, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601; furthermore, service of the filing was by mailing a true and correct of the same, first class postage prepaid, to:

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Atlanta, GA 30309

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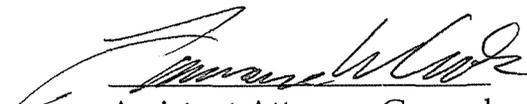
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Farmington, MI 48334

Access Integrated Networks, Inc.
4885 Riverside Dr.
Macon, GA 31210

all on this 23rd day of May, 2006


Assistant Attorney General